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BEFORE THE  
Federal Communications Commission  
WASHINGTON, D.C.

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Telephone Number Portability ) CC Docket No. 95-116

**COMMENTS OF SOUTHWESTERN BELL MOBILE SYSTEMS,  
INC., AND PACIFIC BELL MOBILE SERVICES**

Southwestern Bell Mobile Systems, Inc., and Pacific Bell Mobile Services (collectively "SBMS"), file these comments in support of The Cellular Telecommunications Industry Association's (CTIA) Petition for an extension of wireless number portability implementation deadlines.<sup>1</sup> As SBMS and others noted, both in this docket and in CC Docket No. 94-54, imposing service provider number portability on CMRS carriers causes a significant impact due to the traditional reliance of the industry on the Mobile Identification Number (MIN), especially in the roaming context.<sup>2</sup>

As outlined in the CTIA Petition and accompanying affidavit, the implementation of service provider portability, including the support of roaming functionality, is a complex task. Since its inception, the cellular industry has relied on the MIN being the ten digit telephone number and has established verification, billing and roaming processes on this premise. For example, current roaming verification processes rely on the NPA/NXX portion of the MIN to determine the responsible carrier, that is the CMRS provider with whom the customer is a subscriber of ("Home Carrier"). A carrier ("Serving Carrier")

<sup>1</sup> *Petition For Extension Of Implementation Deadlines of The Cellular Telecommunications Industry Association, In the Matter of Telephone Number Portability*, CC Docket No. 95-116 (filed November 24, 1997).

<sup>2</sup> See e.g., SBC Comments, CC Docket 95-116, filed September 15, 1995, pp. 6, 15, Appendix F; Comments of Southwestern Bell Mobile Systems, Inc., pp. 13-18 CC Docket 94-54, Filed June 14, 1995.

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actually loads the NPA/NXX combinations of the carriers ("Home Carrier") it has automatic roaming agreements in its switch. The NPA/NXX is then used by the Serving Carrier for carrier validation purpose - to see if the Home Carrier of the roaming customer whose MIN/ESN combination has shown up on the Serving Carrier's system has a valid roaming agreement. The NPA/NXX is used to determine the appropriate home location register (HLR) for the customer. The MIN and the HLR information is used to validate the roaming customer through the Home Carrier.<sup>3</sup> Traditionally, in cellular, the tasks of validation, billing and settlement associated with the roaming process work economically and efficiently because the Home Carrier is only required to give the industry notice of which NPA/NXX combinations it is assigned rather than having to notify the industry each time a customer activates service and is assigned a number.<sup>4</sup>

With wireless service provider number portability, the industry is being forced to move away from the traditional standards and processes wherein the carriers relied on the telephone number/MIN (including unique NPA-NXX portion) to verify, identify, and bill subscribers, in addition to routing calls. As CTIA notes, the industry working groups have agreed that the best proposal would be to separate the MIN from the telephone number or mobile directory number (MDN), thus creating a second ten digit number. As noted in the CTIA Petition, the industry is now working on creating the standards to

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<sup>3</sup> Network connectivity between roaming partners is currently handled in one of three ways, through SS7 backbone using IS-41 or GSM interface, through a direct switch-to-switch connection using IS-41 or GSM interface or via clearinghouse through an X-25 connection that may or may not include IS-41 or GSM messaging. The amount of information sent to the Serving Carrier with the validation will depend upon the agreement of the parties and the type of interconnection used.

<sup>4</sup> Cellular carriers generally utilize an agreed upon clearinghouse (GTE TSI or EDS PCD) for settlement purposes. The industry billing standards titled Cellular Intercarrier Billing Exchange Records (CIBER) encompasses bill message format edits, negative file guidelines and tape processing. CIBER allows for smooth processing of the roaming call records for settlement and liability determination.

support the MIN/MDN proposal. However, as outlined in the CTIA Petition and accompanying affidavit, much standards work, development and testing is still required. As the above example indicates, the change involves multiple processes, functionality and systems.


SBMS agrees that the June 30, 1999, implementation date for wireless service provider number portability will not be met. Thus, SBMS supports CTIA's request that the Wireless Telecommunications Bureau exercise its delegated authority to extend the deadline for implementation for 9 months.

The Commission needs to be aware, however, that by supporting the request SBMS is not committing that the solution will be completed and implemented within the 9 month extension period. Given the amount of work and complexity of the issues, such a commitment simply cannot be made. A 9 month extension is being requested because it coincides with the WTB's delegated authority,<sup>5</sup> not because the industry is guaranteeing that its work and implementation will be completed within that time.

#### Conclusion

For the reasons stated herein, SBMS supports the grant of CTIA's Petition.

Southwestern Bell Mobile Systems, Inc.  
Pacific Bell Mobile Services

  
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Bruce E. Beard, Senior Counsel  
Jeanne A. Fischer, Senior Counsel  
13075 Manchester Road  
St. Louis, MO 63131  
(314) 974-2010

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<sup>5</sup> See, 47 CFR 52.31(c).

Carol L. Tacker  
Vice President & General Counsel  
17330 Preston Road, Suite 100  
Dallas, Texas 75252  
(972) 733-2005